

DISTRICT OF NEW JERSEY UNITED STATES BANKRUPTCY COURT	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Ashley M Pascuzzi - 272502018 GROSS POLOWY, LLC Formed in the State of Delaware 2500 Plaza 5, Suite 2548 Jersey City, NJ 07311 (716) 204-1700 E-mail: apascuzzi@grosspolowy.com Attorneys for Creditor Freedom Mortgage Corporation	
In Re:	Case No.: 19-32377-aba
THOMAS P. MCCABE	Judge: Andrew B. Altenburg, Jr.
Debtor(s).	Chapter: 13

**REPLY TO ATTORNEY'S RESPONSE TO
CREDITOR'S CERTIFICATION OF DEFAULT**

Ashley M Pascuzzi, Esq., an attorney duly admitted to practice before the United States Bankruptcy Court for the District of New Jersey, states the following under the penalty of perjury:

1. I am an attorney at law duly licensed to practice before this Court and an associate with the office of Gross Polowy, LLC, attorneys for Freedom Mortgage Corporation ("Secured Creditor"), and as such, am fully familiar with the facts and circumstances of the present case.

2. Secured Creditor is the holder of a note secured by a mortgage on real property commonly known as 3104 Sunset Avenue, Williamstown, NJ 08094 which property is owned by the Debtor.

3. Secured Creditor submits this Reply in response to the Debtors Response to Creditor's Certification of Default.

4. Secured Creditor is entitled to ex parte relief to vacate the stay, as Debtor has defaulted on the terms of the Consent Order submitted with the Certification of Default filed on September 24, 2021.

5. Debtor does not dispute the fact that they are in default of the agreed terms, and as such it is requested this court grant the relief sought.

WHEREFORE, it is respectfully requested that this Court enforce the prior order of this court, vacate the stay, and for such other and further relief as to this Court deems just and equitable.

October 5, 2021

/s/ Ashley M Pascuzzi, Esq.
By: Ashley M Pascuzzi, Esq.